

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW HAMPSHIRE

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KYLE GUAY,  
Plaintiff,

v.

SIG SAUER, INC.  
  
Defendant.

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: CIVIL ACTION NO.:  
: 1:20-CV-00736-LM  
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**JOINT STATEMENT REGARDING STATUS OF DISCOVERY**

The parties have conducted a substantial amount of discovery to date. Written discovery has been completed, and the parties have completed an examination - including a CT scan imaging of the weapon in question. The parties have also obtained Plaintiff's medical records via subpoena. The plaintiff's deposition has been completed, and the parties are in the process of scheduling the deposition of plaintiff's girlfriend, who was the first person on scene after the incident. Defendant also intends to depose the responding officers and EMTs, and Plaintiff intends to conduct a Rule 30(b)(6) deposition of Defendant. The parties anticipate that this remaining fact discovery can be completed by the current October 29, 2021 deadline.

The parties have exchanged their expert reports as required by Fed. R. Civ. P. 26(a)(2). The parties are in the process of scheduling the depositions of their respective experts. While the parties are hopeful that these expert depositions can be completed by the current October 29, 2021 deadline,



they respectfully request an additional thirty days – to November 29, 2021 – to complete expert depositions. The parties also request that the deadline for the parties to file motions for summary judgment be extended to December 15, 2021.

The parties do not believe any additional modifications to the current scheduling order are needed at this point. Plaintiff has conferred with Defendant in drafting this report, and the parties are in agreement regarding the current status.

Respectfully submitted,

Counsel for Plaintiff:

Date: September 9, 2021

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and



Counsel for Defendant:

Date: September 9, 2021

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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing document was served this date upon all counsel of record via the ECF filing system.

/s/ Benjamin T. King  
Benjamin T. King